

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

|                          |   |                            |
|--------------------------|---|----------------------------|
| UNITED STATES OF AMERICA | ) |                            |
|                          | ) | No. <u>3:18-cr-00293-8</u> |
| v.                       | ) |                            |
|                          | ) | Judge Newbern              |
| LUIS COLINDRES           | ) |                            |
| a/k/a “Listo”            | ) |                            |
| a/k/a “Joe”              | ) |                            |

**MOTION FOR DETENTION**

Pursuant to Title 18, United States Code, Section 3142, the Government moves to have the defendant detained pending proceedings in this matter on the basis that he constitutes a danger to the public and flight risk. Specifically, the government intends to show that defendant is a flight risk, pursuant to Title 18, United States Code, Section 3142(d)(1)(B), because he lacks significant ties to the Middle District of Tennessee and is subject to deportation should the Court release the defendant from custody. *See United States v. Veloz-Alonso*, 910 F.3d 266, 268-70 (6th Cir. 2018) (holding that the government – Immigration and Customs Enforcement – may detain an illegal alien pending trial or sentencing, for the purpose of deportation, regardless of a release determination under the Bail Reform Act). Furthermore, the government will establish that the defendant is a danger to the community because he is a member of a violent street gang who was indicted by a federal Grand Jury for his involvement in multiple murders including the murder of a rival gang member and witness. As such, there is a rebuttable presumption of detention, pursuant to Title 18, United States Code, Section 3142(f)(1)(A) and (B) and (C). Thus, the Government moves for the defendant to remain in custody and requests a continuance of three days in order to prepare for the detention hearing.

Respectfully submitted,

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Middle District of Tennessee

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 28, 2021, I filed the attached motion via the ECF filing system which electronically notifies counsel for the defense.

**s/ Ahmed A. Safeeullah**

Ahmed A. Safeeullah

Assistant United States Attorney